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Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

)	12 MDL 2352
In re Century 21 Department Stores,)	(RWS)
LLC Fair and Accurate Credit)	
Transaction Act (FACTA) Litigation)	ORAL ARGUMENT REQUESTED
)	

PLAINTIFFS' NOTICE OF MOTION FOR CLASS CERTIFICATION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that at a date and time to be determined by this Court, in Courtroom 18C, located at 500 Pearl Street, New York, New York 10007, plaintiffs Deborah Petrucci, Yaakov Katz, Nicole Torreblanca and William Needham, will, and hereby do, move this Court under Rule 23 of the Federal Rules of Civil Procedure, for an order certifying this action as a class action consisting of:

All consumers residing in the United States who, on or after June 3, 2008, transacted business with Defendant using a credit card or debit card and who were provided by Defendant with an electronically printed receipt which included more than the last five (5) digits of the customer's credit card or debit card account number; and

appointing Cohn Lifland Pearlman Herrmann & Knopf LLP as class counsel.

This motion is made on the grounds that this action is suited for class treatment and meets the requirements of Rule 23 of the Federal Rules of Civil Procedure.

Plaintiffs' motion is based on Rule 23 of the Federal Rules of Civil Procedure, this Notice of Motion for Class Certification, the Certification and Exhibits attached thereto of Jeffrey W. Herrmann in support thereof, the accompanying Memorandum of Law, both of which have been filed under seal pursuant to the Stipulated Protective Order entered on March 25, 2013 [Docket Entry no. 22], any arguments made before the Court at the hearing on this motion, and all other papers and pleadings filed in this action.

Dated: July 31, 2013

COHN LIFLAND PEARLMAN
HERRMANN & KNOFF LLP

By: /s/Jeffrey W. Herrmann
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Additional Plaintiffs' Counsel

DECLARATION OF SERVICE

I, Barbara Blumberg, not a party to the within action, hereby declare that on July 31, 2013, I served the following the attached Plaintiffs' Motion for Class Certification via Federal Express and electronic mail:

Evan K. Farber, Esq.
Reed Smith LLP
599 Lexington Avenue
New York, NY 10022 07311
ATTORNEYS FOR DEFENDANT

BARBARA BLUMBERG

Dated: July 31, 2013